

1 ROB BONTA
Attorney General of California
2 NORMAN D. MORRISON
Supervising Deputy Attorney General
3 DIANA ESQUIVEL
Deputy Attorney General
4 State Bar No. 202954
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7320
Facsimile: (916) 322-8288
7 E-mail: Diana.Esquivel@doj.ca.gov
8 *Attorneys for Defendants State of California, by and*
through the California Highway Patrol, Blackwood,
Kee, and Rubalcava
9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 EASTERN-RIVERSIDE DIVISION
13

14 **L.C.,**

15 Plaintiffs,

16 **v.**

17 **STATE OF CALIFORNIA, et al.,**

18 Defendants.
19
20
21

No. 5:22-cv-00949 KK-SHKx

STIPULATION OF FACTS

Date: May 15, 2025
Time: 10:30 a.m.
Courtroom: 3 (3rd Floor)
Judge: Honorable Kenly Kiya Kato
Trial Date: June 2, 2025
Action Filed: June 7, 2022

22 The parties agree that the following facts are undisputed:

23 1. The incident occurred on February 17, 2021.

24 2. At all relevant times, Defendants Isaiah Kee, Bernardo Rubalcava, and
25 Michael Blackwood were acting within the course and scope of their employment
26 as California Highway Patrol Officers for the State of California.

27 3. At all relevant times, Defendants Isaiah Kee, Bernardo Rubalcava, and
28 Michael Blackwood were acting under color of state law.

1 4. The incident occurred near the intersection of Peach and Catalpa Streets
2 in Hesperia.

3 5. As a result of the incident, Mr. Puga sustained multiple gunshot wounds.

4 6. Puga died as a result of his gunshot wounds.
5

6 Dated: May 8, 2025

Respectfully submitted,

7 ROB BONTA
8 Attorney General of California
9 NORMAN D. MORRISON
Supervising Deputy Attorney General

10 */s/ Diana Esquivel**

11 DIANA ESQUIVEL
12 Deputy Attorney General
13 *Attorneys for Defendants State,*
Blackwood, Kee, and Rubalcava

14 Dated: May 8, 2025

LAW OFFICES OF DALE K.
GALIPO

15 */s/ Hang D. Le*

16 DALE K. GALIPO
17 HANG D. LE
18 *Attorneys for Plaintiffs*

19 *The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose
20 behalf the filing is submitted, concur with the filing's content and have authorized
21 the filing.
22
23
24
25
26
27
28